

# **EXHIBIT A**

**From:** Buie, Alan (USATXW) <[Alan.Buie@usdoj.gov](mailto:Alan.Buie@usdoj.gov)>  
**Sent:** Friday, February 2, 2024 4:20 PM  
**To:** Gerry Morris <[egm@egmlaw.com](mailto:egm@egmlaw.com)>  
**Cc:** Latcovich, Simon <[SLatcovich@wc.com](mailto:SLatcovich@wc.com)>; Looby, Patrick <[PLooby@wc.com](mailto:PLooby@wc.com)>  
**Subject:** RE: follow up correspondence

A few more updates:

- The bank records are NOT going to fit on the 64GB USB drive that we have now, so you might as well go ahead and retrieve that drive whenever you're ready. It contains the Access database that contains the bank data.
- I'm still collecting bank records. When I know the total volume of all of them, I'll be in touch about hardware for delivery.
- LTSC has reviewed the work order, and they're estimating 60 days for exporting the Relativity database. Copying what they produce onto your hardware will take additional days beyond those 60 days. We do not yet know what size drive we will need for delivery of the database, but I'll let you know as soon as I know.
- Our Relativity database contains natives and text files for all items, and images for most items. Images for about 470,000 items are not included, because those image files exceeded the limit on the size of database that LTSC was able to host. According to our Lit Support people, you will be able to generate the images once you receive the Relativity database, but we do not have them in our database. We have the image files and would be happy to provide them, but our Lit Support folks say that marrying them with the corresponding natives and text files in the Relativity database is not possible.
- I've spoken with our case agent about the CHS-related material that you requested, and he is not aware of a document fitting the description that I conveyed to him based on my last conversation with you. Let's talk about this again next time we're on the phone, and I'll keep working on it.

**From:** Gerry Morris <[egm@egmlaw.com](mailto:egm@egmlaw.com)>  
**Sent:** Wednesday, January 31, 2024 5:32 PM  
**To:** Buie, Alan (USATXW) <[ABuie@usa.doj.gov](mailto:ABuie@usa.doj.gov)>  
**Cc:** Latcovich, Simon <[SLatcovich@wc.com](mailto:SLatcovich@wc.com)>; [plooby@wc.com](mailto:plooby@wc.com)  
**Subject:** [EXTERNAL] RE: follow up correspondence

I'll get one to you next week.

**From:** Buie, Alan (USATXW) <[Alan.Buie@usdoj.gov](mailto:Alan.Buie@usdoj.gov)>  
**Sent:** Wednesday, January 31, 2024 2:37 PM  
**To:** Gerry Morris <[egm@egmlaw.com](mailto:egm@egmlaw.com)>  
**Cc:** Latcovich, Simon <[SLatcovich@wc.com](mailto:SLatcovich@wc.com)>; [plooby@wc.com](mailto:plooby@wc.com)  
**Subject:** RE: follow up correspondence

BTW, I'll need at least a 500 GB drive to hold the copy of the Western Digital My Passport UltraStorage Device.

**From:** Gerry Morris <[egm@egmlaw.com](mailto:egm@egmlaw.com)>  
**Sent:** Wednesday, January 31, 2024 12:34 PM  
**To:** Buie, Alan (USATXW) <[ABuie@usa.doj.gov](mailto:ABuie@usa.doj.gov)>  
**Cc:** Latcovich, Simon <[SLatcovich@wc.com](mailto:SLatcovich@wc.com)>; [plooby@wc.com](mailto:plooby@wc.com)  
**Subject:** [EXTERNAL] RE: follow up correspondence

We would like a forensic copy of the device. I'll be out of town tomorrow and Monday, so no big rush on the financial records.

**From:** Buie, Alan (USATXW) <[Alan.Buie@usdoj.gov](mailto:Alan.Buie@usdoj.gov)>  
**Sent:** Wednesday, January 31, 2024 11:35 AM  
**To:** Gerry Morris <[egm@egmlaw.com](mailto:egm@egmlaw.com)>  
**Cc:** Latcovich, Simon <[SLatcovich@wc.com](mailto:SLatcovich@wc.com)>; [plooby@wc.com](mailto:plooby@wc.com)  
**Subject:** RE: follow up correspondence

Gerry, I received a question about the Western Digital My Passport UltraStorage Device: **do you want a forensic copy of the device (including all of its contents), or just a copy of the files stored on it?** Please let me know, and then I can tell you what size drive I need to borrow from you to deliver the data.

Also, a couple updates:

- Right after we talked Monday afternoon, we placed the order with LTSC to deliver a copy of the Relativity database. Once they study the order, they usually give us an estimate of the turnaround time, but that usually doesn't happen the same day. We're still waiting.
- I've been working on making a copy of all of the financial records for you. The computer ran until late Monday night copying one set, and it ran all day yesterday copying another set. So it's a slow process, but I'm making headway and hoping to have it done this week.

**From:** Buie, Alan (USATXW) <[ABuie@usa.doj.gov](mailto:ABuie@usa.doj.gov)>  
**Sent:** Friday, January 26, 2024 6:34 PM  
**To:** Gerry Morris <[egm@egmlaw.com](mailto:egm@egmlaw.com)>  
**Cc:** Latcovich, Simon <[SLatcovich@wc.com](mailto:SLatcovich@wc.com)>; [plooby@wc.com](mailto:plooby@wc.com); Buie, Alan (USATXW) <[ABuie@usa.doj.gov](mailto:ABuie@usa.doj.gov)>  
**Subject:** RE: follow up correspondence

Jerry, thanks for your letter. I flew back into Austin last night and then spent most of today in a meeting on another matter, or I would have provided a detailed response to your letter sooner.

Also, thanks for dropping off the 64GB USB drive today. Before I left town earlier in the week, I had prepared a discovery production for our staff to load up while I was gone if we received your drive ("the January 22 Production"), and that production includes some of the items listed in your letter. So I'm attaching here a draft of the transmittal letter that I prepared for the January 22 Production, describing what it contains. (A final, signed copy of the letter will go out

with the production.) I'm hoping it will be loaded and ready to go out Monday 29 January, but that's hard to predict.

Concerning the specific items in your letter: below in the left-hand column are the bullet-point items from your letter; in the middle column **in blue** are my comments regarding the status of the items; and in the right-hand column **in green** are any questions that I need your input on before I can move forward with production of the items.

Item from Morris Letter	Status	Questions for Morris
The Access database containing information derived from bank statements for more than 700 bank accounts	This Access database is part of the January 22 Production that we plan to load Monday. (FYI, 700 is a very rough number of bank accounts that I heard from the lead case agent at one point, not a number that the accountants have given me. You will receive an inventory that lists the accounts.)	None
The raw bank statements from the more than 700 accounts that were used to populate the Access database	Over the weekend or early next week, I will collect all of the bank records in preparation for delivering them. Until I do that, I won't know whether they will fit on the USB drive that you dropped off today, or how long loading them will take. So I don't yet know whether I will delay delivering the January 22 Production until I can send the bank records out at the same time on the same USB drive.	None
The documents the government currently has in Relativity format, which includes somewhere between 4 and 4.5 million documents	Monday, or as soon thereafter as I get your input, I will ask our lit support people to place a work order with LTSC for production of these files.	Unless you and your colleagues prefer a different approach, I will ask for LTSC to produce only the files that they did not include in the previous production, which you already have. The processing time for that effort will be less than if we were to include the files that LTSC delivered previously. If you prefer that

		we request a production that includes what LTSC already produced, we can ask, but they may resist repeating that effort. <b>Please let me know your preference.</b>
A copy (from the taint team) of the Western Digital My Passport UltraStorage Device, serial number WX1 1A56A2KP2, which was the subject of the May 23, 2019 search warrant	I will find out Monday how much data this device contained, and let you know what size drive we will need from you for the copy. Once I get your drive, I can send it to San Antonio and ask them to send it back to you with the files; so you won't need to contact anyone in the Filter Team about this.	None
Any remaining grand jury transcripts, including the indictment presentation	This is part of the January 22 Production that we plan to load Monday.	None
Documentation regarding the FBI's human source	I spoke to the case agent about this, and I can share some general observations, but need to discuss with you.	I need to discuss this with you before taking any further steps. It won't be a long discussion, so perhaps we can knock it out when Dan and I talk to you about schedule.
Any remaining 302s, notes, or other witness materials	This is part of the January 22 Production that we plan to load Monday.	None

I hope the foregoing is at least reasonably clear. Please don't hesitate to call me if any of it requires explanation. Thanks.

**Alan M. Buie**  
**512.417.2901**

**From:** Gerry Morris <[egm@egmlaw.com](mailto:egm@egmlaw.com)>  
**Sent:** Wednesday, January 24, 2024 11:28 AM  
**To:** Buie, Alan (USATXW) <[ABuie@usa.doj.gov](mailto:ABuie@usa.doj.gov)>  
**Subject:** [EXTERNAL] follow up correspondence

Alan:

Attached is correspondence following up on our call last week. Do you have time for a call this afternoon or tomorrow?

EGM